

<p>UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY <b>Caption in compliance with D.N.J. LBR 9004-1</b></p>	
<p><b>GIBBONS P.C.</b> Karen A. Giannelli, Esq. Mark B. Conlan, Esq. Brett S. Theisen, Esq. One Gateway Center Newark, New Jersey 07102 Telephone: (973) 596-4500 Facsimile: (973) 596-0545 E-mail: <a href="mailto:kgiannelli@gibbonslaw.com">kgiannelli@gibbonslaw.com</a> <a href="mailto:mconlan@gibbonslaw.com">mconlan@gibbonslaw.com</a> <a href="mailto:btheisen@gibbonslaw.com">btheisen@gibbonslaw.com</a> <i>Counsel to the Debtors and Debtors-in-Possession</i></p>	
<p>In re:  NEW ENGLAND MOTOR FREIGHT, INC., <i>et al.</i>,  Debtors.<sup>1</sup></p>	<p>Chapter 11  Case No. 19-12809 (JKS) (Jointly Administered)  <b>Hearing Date:</b> <b>November 19, 2019 @ 10:00 a.m.</b>  <b>Judge: Hon. John K. Sherwood</b></p>
<p>NEW ENGLAND MOTOR FREIGHT, INC. <i>et al.</i>,  Plaintiffs,  v.  PARTIES LISTED ON EXHIBIT A TO THE COMPLAINT and JOHN DOES 1-100,  Defendants.</p>	<p>Adv. Proc. No. 19-1119 (JKS)</p>

## ADJOURNMENT REQUEST

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<sup>1</sup> The Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number are as follows: New England Motor Freight, Inc. (7697); Eastern Freight Ways, Inc. (3461); NEMF World Transport, Inc. (2777); Apex Logistics, Inc. (5347); Jans Leasing Corp. (9009); Carrier Industries, Inc. (9223); Myar, LLC (4357); MyJon, LLC (7305); Hollywood Avenue Solar, LLC (2206); United Express Solar, LLC (1126); and NEMF Logistics, LLC (4666).

1. I, BRETT S. THEISEN, ESQ.,

☒ am the attorney for: New England Motor Freight, Inc. et al., Debtors And Debtors In Possession,

☐ am self-represented,

and request an adjournment of the following hearings for the reason set forth below.

Matters:

- **Adv. Proc. No. 19-1119—**
  - Pre-Trial Conference
  - Debtors' Motion to Enjoin Auto Liability Claims [Dkt. No. 3]
- **Lead Case No. 19-12809—**
  - Motion for Relief from the Automatic Stay [Dkt. No. 266]
  - Motion for Relief from the Automatic Stay [Dkt. No. 378]
  - Motion for Relief from the Automatic Stay [Dkt. No. 440]
  - Motion for Relief from the Automatic Stay [Dkt. No. 502]
  - Motion for Relief from the Automatic Stay [Dkt. No. 585]
  - Motion for Relief from the Automatic Stay [Dkt. No. 631]
  - Motion for Relief from the Automatic Stay [Dkt. No. 674]
  - Motion for Relief from the Automatic Stay [Dkt. No. 693]
  - Motion for Relief from the Automatic Stay [Dkt. No. 763]
  - Motion for Relief from the Automatic Stay [Dkt. No. 768]

Current hearing date and time: November 19, 2019 @ 10:00 a.m.

New date requested: February 11, 2020 @ 10:00 a.m.

Reason for adjournment request: The parties to the above-referenced matters have agreed to (i) adjourn the matters pending confirmation of the Debtors' and the Creditors Committee's joint combined plan and disclosure statement, and (ii) consent to an extension of the temporary restraining order entered in Adv. Proc. No. 19-1119, Dkt. No. 44, through and including the new hearing date, February 11, 2020.

The parties also request that the current deadline to submit further pleadings in support of, or opposition to, the pending matters be extended from November 18, 2019 at 12:00pm to February 10, 2020 at 12:00pm.

A proposed order extending the temporary restraining order is being submitted contemporaneously herewith.

All of the matters listed above are related to existing or potential Auto Liability Claims against the Debtors, and have been previously adjourned to allow for settlement negotiations to take place. The Debtors and the Committee filed a joint combined chapter 11 plan and disclosure statement on October 21, 2019 (followed by amended versions on November 8 and 12, respectively), which incorporates a proposed settlement involving the Auto Liability Claims and a consensual protocol for the orderly liquidation of those claims. On November 15, 2019, the Court conditionally approved the disclosure statement and the proposed solicitation procedures. A confirmation hearing is scheduled for January 14, 2020. The Plan contemplates an Effective Date no earlier than February 3, 2020. This adjournment is necessary to allow the Plan to become effective, which will moot all pending motions and allow the Debtors to dismiss the adversary proceeding.

2. Consent to adjournment:

☒ I have the consent of all parties. ☐ I do not have the consent of all parties (explain below):

I certify under penalty of perjury that the foregoing is true.

Date: November 18, 2019

Brett S. Theisen, Esq.

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The request for adjournment is:

- ☒ Granted      New hearing date: 2/11/2020      ☐ Peremptory
- ☐ Granted over objection(s)      New hearing date: \_\_\_\_\_      ☐ Peremptory
- ☐ Denied